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### UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS

In Re:	)	
	) Case No. 19-34847	
Annie Williams	) Chapter 7	
	) Judge Deborah L. Th	orne
	)	
	j	

#### **Notice of Motion**

To: See Attached Service List

PLEASE TAKE NOTICE that on Thursday, April 29, at 9:00 a.m., I will appear before the Honorable Deborah L. Thorne, or any judge sitting in that judge's place, and present the motion of Annie Williams to Reopen the Chapter 7 Petition, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <a href="https://www.zoom.gov.com">https://www.zoom.gov.com</a>. Then enter the meeting ID.

**To appear by telephone,** call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID.

**Meeting ID and password.** The meeting ID for this hearing is 160 9362 1728 – no password required. The meeting ID and further information can also be found on Judge Thorne's web page on the court's website.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date, If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

By:	
	/s/ James Calvo
_	James Calvo

James W. Calvo Calvo Law Offices, P.C. 1700 Park Street, Suite 211 Naperville, Illinois 60563 info@jamescalvolaw.com Phone: (630) 857 – 3788

Date: April 20, 2021

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### **CERTIFICATE OF SERVICE**

I, James W. Calvo certify that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on April 20, 2021, at or before 5:00 p.m.

By:	
	/s/ James Calvo
	James Calvo

Date: April 20, 2021

#### Registrants Served Through the Court's Electronic Notice for Registrants

Patrick Layng - Office of the United States Trustee USTPRegion11.ES.ECF@usdoj.gov

N. Neville Reid - Chapter 7 Trustee nreid@foxswibel.com

#### **Mailing List**

A/r Concepts 18-3 Dundee Road Barrington, IL 60010

Amerifirst Home Imprevement Finance Attn. Bankruptcy 11171 Mill valley Road Omaha, NE 68154

Amita Health Adventist Medical Cent 120 North Oak Street Hinsdale, IL 60521

Amita Health Adventist Medical Cent 5101 Willow Springs Road La Grange, Illinois 60525

Atg Credit Attn: Bankruptcy 1700 West Cortland Street, Ste 201 Chicago, IL 60622

Capital One Attn: Bankruptcy Po Box 30285 Salt Lake City, UT 84130

Kohls/Capital One Attn: Credit Administrator Po Box 3043 Milwaukee, WI 53201

Merchants Credit 223 West Jackson Blvd Suite 700 Chicago, IL 60606 Citibank/Sears Attn: Bankruptcy Po Box 6275 Sioux Falls, SD 57117

Comenity Bank/Avenue Attn: Bankruptcy Po Box 182125 Columbus, OH 43218

Comenity Bank/Victoria Secret Attn: Bankruptcy Po Box 182125 Columbus, OH 43218

Comenity Bank/HSN Attn: Bankruptcy Po Box 182125 Columbus, OH 43218

Comenity Bank/New York Attn: Bankruptcy Po Box 182125 Columbus, OH 43218

Comenity Bank/Indclb Attn: Bankruptcy Po Box 182125 Columbus, OH 43218

Midland Funding 2365 Northside Dr. Suite 300 Sandeigo, CA 92108

Mr. Cooper Attn: Bankruptcy 8950 Cypress Waters Blvd Coppell, TX 75019 Numark Credit Union Attn: bankruptcy Po Box 2729 Joliet, IL 60434

Springleaf Financial S Po Box 969 Evansville, IN 47706

Synchrony Bank/JC Pennys Attn: Bankruptcy Po Box 956060 Orlando, FL 32896

Synchrony Bank/Care Credit Attn: Bankruptcy Po Box 956060 Orlando, FL 32896

Synchrony Bank/QVC Attn: Bankruptcy Po Box 956060 Orlando, FL 32896

Synchrony Bank/TJX Attn: Bankruptcy Po Box 956060 Orlando, FL 32896

Synchrony Bank/Walmart Attn: Bankruptcy Po Box 956060 Orlando, FL 32896 Case 19-34847 Doc 31 Filed 04/20/21 Entered 04/20/21 15:29:58 Desc Main Document Page 5 of 8

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

In Re:	)	
	) Case No. 19-34847	
Annie Williams	) Chapter 7	
	) Judge Deborah L. Tho	orne
	)	
	)	

# MOTION TO REOPEN CASE AND ALLOW FILING OF CERTIFICATE OF DEBTOR EDUCATION IN ORDER TO RECEIVE DISCHARGE

Now comes the Debtor, Annie Williams, by and through her attorneys, Calvo Law Offices P.C., and respectfully petitions this Honorable Court to Motion to Reopen Case and Allow Filing of Certificate of Debtor Education in Order to Receive Discharge. In support of her Motion, the Debtor states as follows:

- 1) On December 11, 2019, Debtor Annie Williams ("Annie"), filed her Chapter 7 Petition.
  - 2) A section 341(a) Meeting of the Creditors was conducted on March 12, 2020.
  - 3) The Chapter 7 Trustee made a finding of no assets.
- 4) Days after the section 314(a) meeting, Illinois went into a full lockdown due to the COVID-19 pandemic.
- 5) The COVID-19 pandemic and concurrent lockdown dramatically altered Annie's routine.
- 6) Annie faced difficulties as a result of the COVID-19 pandemic and lockdown that interfered with her completion of the second debtor education course.
- 7) On April 15, 2021, Annie completed the second debtor education course. A copy of the Certificate of Debtor Education is attached hereto as **Exhibit A**.

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- 8) On September 15, 2021, the Notice of Chapter 7 Closed Without Discharge was entered in this matter because the Certificate of Debtor Education had not been filed.
- 9) Annie now petitions this Court to Reopen this matter to allow the filing of the Certificate of Debtor Education.
  - 10) Annie has paid the reopening fee to the Court.

WHEREFORE Debtor prays that an Order be entered Reopening Case No. 19-34847 and allowing Debtor leave to file Form 423 Certification About Financial Monument Course.

By /s/ James W. Calvo James W. Calvo

James W. Calvo ARDC No. 6330850 Calvo Law Offices, P.C. 1700 Park Street, Suite 211 Naperville, Illinois 605463 info@jamescalvolaw.com Phone: (630) 857-3788

Fax: (331) 472-4556

Exhibit A

Certificate Number: 16339-ILN-DE-035575307

Bankruptcy Case Number: 19-34847



### **CERTIFICATE OF DEBTOR EDUCATION**

I CERTIFY that on April 15, 2021, at 6:24 o'clock PM EDT, Annie Williams completed a course on personal financial management given by internet by Second Bankruptcy Course, LLC, a provider approved pursuant to 11 U.S.C. 111 to provide an instructional course concerning personal financial management in the Northern District of Illinois.

Date: April 15, 2021 By: /s/Kelley Tipton

Name: Kelley Tipton

Title: Certified Financial Counselor